

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:  
  
CITY OF DETROIT, MICHIGAN  
  
Debtor.

Chapter 9  
  
Case No. 13-53846  
  
Hon. Steven W. Rhodes

**SUMMARY OF OUTSTANDING ISSUES WITH THE  
DEBTOR'S PRODUCTION OF DOCUMENTS IN RESPONSE  
TO THE DWSD DISCOVERY PARTIES' DOCUMENT REQUESTS**

Assured Guaranty Municipal Corp. (“Assured”), National Public Finance Guarantee Corporation (“National”) and Berkshire Hathaway Assurance Corporation (“BHAC” and together with National and Assured, the “DWSD Discovery Parties”), in connection with the May 28, 2014 hearing, hereby submit the attached chart summarizing the DWSD Discovery Parties’ outstanding issues with the document production of the Debtor, the City of Detroit, Michigan (the “City”) in response to the *DWSD Discovery Parties’ First Set of Joint Requests for the Production of Documents to Debtor the City of Detroit, Michigan* [ECF No. 4041]. The DWSD Discovery Parties and the City continue to work together to resolve the open document discovery issues as expeditiously as possible, but make this submission to identify the outstanding issues concerning the DWSD Discovery Parties at this time and in light of the May 28, 2014 hearing.

Respectfully submitted,

Dated: May 27, 2014

By: /s/ Lawrence A. Larose

Lawrence A. Larose  
Samuel S. Kohn  
Robert A. Schwinger  
CHADBOURNE & PARKE LLP  
30 Rockefeller Plaza  
New York, NY 10112  
Telephone: (212) 408-5100  
llarose@chadbourne.com  
skohn@chadbourrne.com  
rschwinger@chadbourne.com

– and –

Robin D. Ball  
CHADBOURNE & PARKE LLP  
350 South Grand Ave., 32nd Floor Los  
Angeles, CA 90071  
Telephone: (213) 892-2025  
Fax: (213) 892-2045  
rball@chadbourne.com

*Counsel for Assured Guaranty  
Municipal Corp.*

By: /s/ My Chi To  
My Chi To  
DEBEVOISE & PLIMPTON LLP  
919 Third Avenue  
New York, New York 10022  
Telephone: (212) 909-7435  
Fax: (212) 521-7425

*Counsel for Berkshire Hathaway  
Assurance Corporation*

By: /s/ Louis P. Rochkind

Louis P. Rochkind (P24121)  
Paul R. Hage (P70460)  
JAFFE RAITT HEUER & WEISS, P.C.  
27777 Franklin Road, Suite 2500  
Southfield, MI 48034-8214  
Telephone: (248) 351-3000  
lrochkind@jaffelaw.com  
phage@jaffelaw.com

James F. Bendernagel, Jr.  
Guy S. Neal  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, D.C. 20005  
Telephone: (202) 736-8041  
jbendernagel@sidley.com  
gneal@sidley.com

Jeffrey E. Bjork  
Gabriel MacConaill  
SIDLEY AUSTIN LLP  
555 West Fifth Street, Suite 4000  
Los Angeles, California 90013  
Telephone: (213) 896-6000  
bjbjork@sidley.com  
gmacconaill@sidley.com

*Counsel for National Public Finance  
Guarantee Corp.*